REMARKS

The above amendments and following remarks are submitted in response to the Official Action of the Examiner mailed December 29, 2005. Having addressed all objections and grounds of rejection, claims 1-20, being all the pending claims, are now deemed in condition for allowance.

Claim 16 has been rejected under 35 U.S.C. 112, second paragraph, as being indefinite in view of a typographical informality. In response thereto, claim 16 has been amended as suggested by the Examiner.

Claims 1-20 have been rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,058,264, issued to Glaser (hereinafter referred to as "Glaser"). This ground of rejection is respectfully traversed as to amended claims 1-20 for the following reasons.

The standards for a finding of anticipation during examination are specified in MPEP 2131, which provides in part:

> TO ANTICIPATE A CLAIM, THE REFERENCE MUST TEACH EVERY ELEMENT OF THE CLAIM
>
> "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).
>
> "**The identical invention must be shown in as complete detail as is contained in the ... claim.**" *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). (emphasis added)

The rejection is respectfully traversed because Glaser does not show "the identical invention" "in as complete detail as is contained in the claim[s]" as required by MPEP 2131.

Though there are numerous differences between Applicant's claimed invention and the disclosure of Glaser, the Examiner may wish to consider Development Computer 400 of Glaser (see Fig. 4). As explained at column 5, line 14, through column 6, line 23, Development Computer 400 provides the "development environment" for Glaser. This environment of Glaser apparently provides a single location for development of a Graphical User Interface (GUI) for developing "extenders" for a plurality of data base management systems without using the facilities of the data base management systems.

Applicant's claimed invention, on the other hand, is directed to providing a plurality of Graphical User Interfaces for a given data base management system primarily using the resources of the data base management system. The advantages of relying upon the power of the data base management system to construct the GUI are discussed throughout Applicant's disclosure, and the approach is summarized at page 10, lines 20-21:

> In accordance with the present invention, a customized user interface is built from multiple components stored in the proprietary database management system.

As a result, there are any number of limitations to be found within Applicant's claims, as amended, specifically directed to this distinction which are not found in Glaser.

In other words, Glaser is interested in providing a standardized interface to an RDBMS without modifying the RDBMS. Thus, the allegedly new interface of Glaser is developed completely external to the RDBMS. As clearly shown in Fig. 4 of Glaser, all of these allegedly new interface functions are developed and performed within Development Computer 400.

Applicants, on the other hand, specifically require that the new interface be created in accordance with modifications to the legacy data base management system. This is certainly much cheaper than the approach of Glaser, because it does not need Development Computer 400. It is also much more flexible than the approach of Glaser as is documented in Applicants' specification.

Claim 1, as amended, requires at element b, "a Data Wizard located within said data base management system" (as shown as element 420 of Fig. 14). This is clearly not found within Glaser, as acknowledged in her rejection by finding that Figs 7A-G allegedly show the claimed Data Wizard. Thus, the claimed invention utilizes the power of the claimed data base management system to construct the "service requests" used to direct the data base management system. On the other hand, the creation of

the "extender" occurs within the development computer 400 of Glaser.

Claim element b also requires that each service request be user specified as "a plurality of discrete and independent steps corresponding to said ordered sequence of command language script" permitting each step to be separately and independently edited with the claimed Data Wizard. This functionality is summarized in the specification at page 12, line 21, through page 13, line 9, and described in detail in Figs. 25-35 with corresponding detailed description at pages 57-67.

Glaser has no provision for accommodating these developmental features. Therefore, the Examiner cites Figs 7A-7C and corresponding text of Glaser. Though the Examiner appears to focus on the ability of Glaser to select an "attribute", there is no showing that any particular selected "attribute" is associated with a single step of the "extender" being created as claimed. In fact, it is clear that the opposite is true. Selection of an "attribute" of Glaser means selection of that "attribute" for all of the "extender". Surely, the Examiner can distinguish between the claimed modifying of a portion (i.e., step) of the claimed service request and the action of Glaser to select an "attribute" for all of the "extender.

As amended, the third element is limited by a "save component module" located within the claimed data base management

system. In making her rejection, the Examiner cites the irrelevant column 9, lines 14-40. The citation at column 9, lines 14-40, is totally irrelevant, because it refers to "a dynamic link library" which is clearly not created in accordance with the extender and does not indicate where it is stored or where it is located. The remainder of the citation discusses script without regard to where it is stored and which "enables a table" rather than be created from a table as claimed. It is not understood why the Examiner considers this citation relevant to the claimed element, but it is clear that the citation does not meet the requirements of MPEP 2131.

The rejection of claim 1 as amended, and all claims depending therefrom, is respectfully traversed for failure of Glaser to show "the identical invention" "in as complete detail as is contained in the claim" as required by MPEP 2131.

Claim 6 requires a "user terminal which makes a service request for modification of data within a data base". In clearly erroneously finding this element, the Examiner cites Client Computer 102, Fig. 1. However, there is no showing that Client Computer 102 of Fig. 1 "makes a service request for modification of data within a data base". The only description of Client Computer 102 is found at column 3, line 64, through column 4, line 3. There is no suggestion that Client Computer 102 "makes a

service request for modification of data within a data base" as clearly erroneously found by the Examiner.

As if to acknowledge this deficiency in Glaser, the Examiner also cites column 3, lines 49-56, which summarizes the operation of the RAD tool. Yet the RAD tool is located within and executed by Development Computer 400 not Client Computer 102 (see column 5, lines 16-19). Surely, the Examiner does not allege that the cited RAD tool is executed within Client Computer 102 as she has implied in her rejection.

The fourth element of claim 6 is "a service module located within said data base management system". In making her rejection, the Examiner cites Figs. 7A-7G of Glaser. Surely, the Examiner does not assert that Figs. 7A-7G of Glaser are "located within" RDBMS 126 which the Examiner has found to be the claimed "data base management system".

Furthermore, the Examiner cites column 9, lines 14-40, of Glaser which has nothing to do with Figs. 7A-7G and nothing to do with the claimed invention. The rejection of amended claim 6, and all claims depending therefrom, is respectfully traversed.

Claim 11, as amended, is an independent method claim having four basic method step limitations. As explained above, Applicant's invention expresses a service request as a plurality of individual and independent steps. In making her rejection, the Examiner continues to cite Figs. 7A-7G and column 3, lines

49-56, of Glaser which involves the steps required to develop a single query as opposed to the claimed "steps" which define the claimed service request. Applicants express a plurality of data processing functions using a plurality of data processing steps. Glaser utilizes a plurality of user actions (i.e., Figs. 7A-7G) to define a single query. In Applicants' claimed system, the data processing system performs the claimed plurality of steps. In Glaser's system, the user performs the alleged plurality of steps by proceeding from Fig. 7A through Fig. 7G to define a single query.

Furthermore, claim 11 requires a "storing step". As explained above, Glaser does not have the "storing" step. As discussed above, the Examiner has confusingly cited column 9, lines 14-40, which simply does not address the claimed invention, because it involves a link library which may be stored at an unidentified location. The rejection of claim 11, and all claims depending therefrom, is respectfully traversed.

Claim 16 is an independent apparatus claim having four separate "means-plus-function" limitations. Claim 16 requires that the claimed "steps" are discrete and independent to permit individual editing without impact upon other steps. As explained above, this feature is not found in Glaser. Claim 16 requires that the "storing means" be located within the claimed "providing means". Glaser clearly utilizes only development computer 400.

The rejection of claim 16, and all claims depending therefrom, is respectfully traversed.

Claims 2, 7, and 18 depend from claims 1, 6, and 17, respectively, and further limit the claimed network. Glaser cannot meet the limitations of claims 1, 6, and 17 for the reasons provided above. Therefore, Glaser cannot meet the further limitations of claims 2, 7, and 18. The rejection of claims 2, 7, and 18 is respectfully traversed.

Claims 3, 9, 13-14, and 20 depend from claims 2, 8, 12, and 19, respectively, and further limit the software architecture of the claimed user terminal. In making her rejection, the Examiner cites Glaser, Fig. 1, element 102. Fig. 1 says nothing of the software architecture of Client Computer 102. It could be a MACINTOSH computer, having a commercially available browser; it could be a DEC, computer having a commercially available browser; etc. In fact, Glaser does not define the software architecture of Client Computer 102 anywhere. Therefore, the rejection of claims 3, 9, 13-14, and 20 is respectfully traversed, because Glaser does not show "the identical invention" "in as complete detail as is contained in the claim[s]" as required by MPEP 2131.

Claims 4, 8, and 17 depend from claims 3, 7, and 16, respectively, and are further limited wherein the claimed "**Data Wizard**" has certain editing features. Glaser on the other hand,

cannot edit the claimed individual steps because it does not have individual steps.

However, the functional differences admitted by the Examiner correspond to actual structural differences. The structure of Applicant's claimed "Data Wizard" is different from the structure of Glaser's "Extender Smart Guide" in that Applicant's invention offers display of individual steps whereas Glaser's does not. It is these structural differences which render Applicant's claimed invention patentable over Glaser in accordance with MPEP 2131. The rejection of claims 4, 8, and 17 is respectfully traversed.

Claims 5, 10, 15, and 19 depend from claims 4, 9, 14, and 18, respectively, and further limit the claimed "data base management system" to a "commercial" system. In making her rejection, the Examiner cites Glaser, column 3, lines 49-56, holding that Glaser "is primarily targeted to enterprise customers". Surely, the Examiner can distinguish between the claimed "commercial" system which may or may not be an enterprise system and Glaser's "enterprise customers" which may or may not use the claimed "commercial" system.

Instead, the Examiner states:

> Since (sic) the system targets on (sic) enterprise customers, the system relating to economic business (sic) thus datable (sic) management system of Glaser is commercially) (sic).

This statement, to the extent understandable, is legally irrelevant, because it does not address Applicant's claimed invention. An enterprise system may be proprietary, and economic businesses may utilize proprietary data base management systems or may utilize no data base management systems at all. The rejection of claims 5, 10, 15, and 19 is respectfully traversed.

Claim 12 depends from claim 11 and is further limited by an "editing said previous discrete and independent step without modification to said subsequent discrete and independent step". Because Glaser does not have the claimed "discrete and independent steps", the Examiner again cites Figs. 7A-7G of Glaser, which simply shows the user steps needed to define a single query. The rejection of claim 12 is respectfully traversed.

Having thus responded to each objection and ground of rejection, Applicants respectfully request entry of this amendment and allowance of claims 1-20, being the only pending claims.

Please charge any deficiencies or credit any overpayment to Deposit Account No. 14-0620.

Respectfully submitted,

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By their attorney,

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